



August 8, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550- 3650 MHz Band, Docket No. 12-354

Dear Ms. Dortch,

We are a group of entrepreneurs and innovators developing new technologies, creating jobs, and driving the digital economy. Because all of our respective businesses depend on the expansion of broadband, we are eager to support initiatives to get more people connected.

In April 2015, the Federal Communications Commission unanimously voted to create the Citizens Broadband Radio Service (CBRS) in the 3.5 GHz band. This measure created a 150-megahertz band suitable for wireless broadband, including 100 megahertz previously unavailable for commercial use because they were earmarked for military radars. We write today in support of the FCC rules originally adopted in 2015 and affirmed in 2016 that reject drastic changes that could undermine existing investments, market expectations, and the ability of investors like ourselves to rely on FCC rules.

Before 2015, the 3.5 GHz band was almost entirely unused across most of the United States. This innovative spectrum sharing framework, put into place by the FCC, includes three tiers: one for military incumbents, a Priority Access tier (small-area licenses), and a General Authorized Access tier (similar to the unlicensed spectrum used for Wi-Fi). The three-tiered framework promotes broadband innovation and investment by facilitating spectrum availability on a very localized basis while reducing barriers to entry.

This three-tiered approach is great for startups and entrepreneurs because anyone can create an LTE-based network in a specific geographic area without an expensive license to exclusive spectrum. This innovative spectrum sharing model would enable new entities to offer services by creating their own so-called private LTE networks without having to purchase spectrum.

Such private LTE networks can be used for industrial IoT—on a factory floor—or enterprise use in general.

With over 50 billion devices projected to connect to the Internet by 2020, our need for mobile bandwidth is large and growing. The United States' status as a global wireless and innovation leader depends on its ability to make more spectrum available for commercial use. American consumers demand fast, reliable connections for their devices; innovative frameworks such as CBRS can be a paradigm for future spectrum-sharing agreements.

Any consideration of potential rule changes must not inject uncertainty or delay into the ongoing standard development and deployment processes or strand previous capital investments made in reliance on the current administration. We ask the FCC to continue supporting innovative spectrum sharing systems like CBRS so that the digital economy can continue to flourish and expand and so that innovators, entrepreneurs, and startups have the necessary bandwidth for the billions of connected devices in existence.

Revisiting the CBRS licensing or technical rules for broad consideration of major rule changes would likely decrease investment in the band and discourage further investment that relies on certainty in the regulatory environment. We urge the Commission to ensure that any changes to its rules are limited and consistent with the vision that has guided industry investment and planning and to not delay commercial service to consumers.

Respectfully submitted,

Engine Advocacy
Union Square Ventures